

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

GENERAL ELECTRIC COMPANY,)	
)	
)	
Plaintiff,)	
)	
v.)	Case No. 1:23-cv-08346 (PKC)
)	
GLOBAL FIBERGLASS SOLUTIONS)	
OF TEXAS, LLC,)	
)	
Defendant.)	

**PROPOSED ORDER GRANTING
PLAINTIFF'S MOTION FOR DEFAULT JUDGMENT
AND ENTRY OF DECLARATORY JUDGMENT**


This action having been commenced on September 20, 2023, by Plaintiff GENERAL ELECTRIC COMPANY'S filing of the Summons and Complaint and the Complaint having been properly served on Defendant GLOBAL FIBERGLASS SOLUTIONS OF TEXAS, LLC on September 22, 2023, Defendant not having answered the Complaint, the time for answering the Complaint having expired, the Clerk having issued a certificate of default on January 24, 2024, and this Motion for Default Judgment being supported by the Declarations of Shanon Lutomski, Jacob M. Kaplan, and Andrew Anderson, it is

ORDERED, ADJUDGED, AND DECREED: That Defendant GLOBAL FIBERGLASS SOLUTIONS OF TEXAS, LLC must fully defend and indemnify Plaintiff GENERAL ELECTRIC COMPANY from and against any and all third-party claims and demands arising from the wind turbine blades subject to the Blade Recycling Agreements, including as to the claims already brought.

It is further ORDERED, ADJUDGED, AND DECREED: That Plaintiff GENERAL ELECTRIC COMPANY have judgment against Defendant GLOBAL FIBERGLASS SOLUTIONS OF TEXAS, LLC in the amount of \$15,464,051.90 in damages for the claims of fraudulent inducement, breach of contract, common law fraud, and breach of the implied covenant of good faith and fair dealing; \$ 8,060,795.⁹³ in pre-judgment interest on the breach of contract claim under N.Y. C.P.L.R. §§ 5001, 5004, as calculated by the Clerk of Court, ~~see id. §§~~ 5001(e); attorneys' fees and costs in the amount of \$698,681.98; and \$ _____ in post-judgment interest (shall be computed in accordance with, under 28 U.S.C. § 1961.

Dated: New York, New York

October 2, 2024



U.S.D.J.

This document was entered in the docket
on October 3, 2024.